

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
Dallas Division**

CHARLENE CARTER, Plaintiff, v. SOUTHWEST AIRLINES CO., AND TRANSPORT WORKERS UNION OF AMERICA, LOCAL 556, Defendants.	Civil Case No. 3:17-cv-02278-X PLAINTIFF CHARLENE CARTER’S RESPONSE TO SOUTHWEST AIRLINES CO.’S RENEWED MOTION FOR JUDGMENT AS A MATTER OF LAW; OR, IN THE ALTERNATIVE, FOR NEW TRIAL; OR, IN THE ALTERNATIVE, FOR REMITTITUR
---	---

Pursuant to Federal Rules of Civil Procedure, Rule 50(b) and 59(a), Plaintiff Charlene Carter (“Carter”), through her counsel of record, hereby responds to Defendant Southwest Airlines Co.’s (“Southwest”) renewed motion for judgment as a matter of law; or, in the alternative, for new trial; or, in the alternative, for remittitur.¹ Carter files her supporting brief contemporaneously with this response. The Court should deny Southwest’s motion in its entirety.

Dated: January 23, 2023

Respectfully submitted,

/s/ Matthew B. Gilliam

Mathew B. Gilliam (*admitted pro hac vice*)

New York Bar No. 5005996

mbg@nrtw.org

c/o National Right to Work Legal Defense
Foundation, Inc.

8001 Braddock Road, Suite 600

Springfield, Virginia 22160

Tel: 703-321-8510

Fax: 703-321-9319

¹ Doc. Nos. 386, 386-1, 387, and 387-1.

Bobby G. Pryor
State Bar No. 16373720
bpryor@pryorandbruce.com
Matthew D. Hill, Of Counsel
State Bar No. 24032296
mhill@pryorandbruce.com
PRYOR & BRUCE
302 N. San Jacinto
Rockwall, TX 75087
Telephone: (972) 771-3933
Facsimile: (972) 771-8343

Attorneys for Plaintiff Charlene Carter

Certificate of Service

I hereby certify that on January 23, 2023, I electronically filed the foregoing document with the Clerk of Court by using the CM/ECF system, which will send a notice of electronic filing to all counsel of record.

/s/ Matthew B. Gilliam